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18 **Pro Hac Vice Applications Forthcoming*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 JANE DOE,

2 Plaintiff,

3 v.

4 JOSEPH LOMBARDO, Governor of Nevada
5 in his official capacity; AARON FORD,
6 Attorney General of Nevada in his official
7 capacity; NYE COUNTY; ELKO COUNTY;
8 STOREY COUNTY; WESTERN BEST, INC,
9 D/B/A CHICKEN RANCH; WESTERN BEST,
10 LLC; DESERT ROSE CLUB, LLC;
11 HACIENDA ROOMING HOUSE, INC. D/B/A
12 BELLA'S HACIENDA RANCH; MUSTANG
13 RANCH PRODUCTIONS, LLC D/B/A
14 MUSTANG RANCH LOUNGE, LLC; AND
15 LEONARD "LANCE" GILMAN in his official
16 capacity,

17 Defendants.

18 CASE NO.: 3:24-cv-00065-MMD-CSD

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STIPULATION AND ORDER TO
STAY DISCOVERY DEADLINES
PENDING COURT'S DISPOSITION
AS TO UNRESOLVED DISPOSITIVE
MOTIONS

[FIRST REQUEST]

1 COMES NOW Plaintiff Jane Doe, by and through her counsel of record, and Defendants
2 Joseph Lombardo and Aaron Ford (“State Defendants”), Defendants Nye County, Elko County,
3 and Storey County (“County Defendants”) by and through their counsel of record, Defendant
4 Desert Rose Club, LLC, Mustang Ranch Productions, LLC and Leonard “Lance” Gilman, by and
5 through their counsel of record, Western Best, Inc. d/b/a Chicken Ranch, and Western Best, LLC
6 by and through their counsel of record and hereby stipulate and agree to the following regarding
7 staying the discovery deadlines in this case.

- 8
- 9 1. On February 25, 2024, County Defendants filed a Motion to Dismiss [ECF No. 5]. This
10 matter has been fully briefed and is pending this Court’s decision.
 - 11 2. On February 29, 2024, Defendants Mustang Ranch Productions, LLC and Leonard
12 “Lance” Gilman filed a Motion to Dismiss [ECF No. 6] and filed a joinder to [ECF No.
13 5]. This matter has been fully briefed and is pending this Court’s decision.
 - 14 3. On April 1, 2024, State Defendants filed a Motion to Dismiss [ECF No. 24]. The
15 briefing in this matter is not yet complete, and is therefore still pending the Court’s
16 decision.
 - 17 4. On April 2, 2024, Defendants Mustang Ranch Productions, LLC and Leonard “Lance”
18 Gilman filed a joinder to [ECF No. 24] and [ECF No. 36].
 - 19 5. On April 2, 2024, State Defendants filed a Motion to Stay Discovery [ECF No. 30].
20 Rather than responding to this motion, Plaintiff has prepared this instant stipulation.
 - 21 6. Also, on April 2, 2024, Defendant Desert Rose Club, LLC filed joinders to [ECF No.
22 5], [ECF No. 6], [ECF No. 16] and [ECF No. 18].
 - 23 7. On April 12, 2024, County Defendants filed a Motion to Dismiss [ECF No. 43]. This
24 matter has been fully briefed and is pending the Court’s decision.
 - 25 8. In an effort to maintain judicial economy, the parties agree to stay discovery deadlines
26 until this Court has adjudicated the above dispositive motions.

1 **IT IS SO STIPULATED.**
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4 DATED this 8th day of May, 2024.
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6 **AARON FORD**
7 **Attorney General**

8 */s/ Iva K. Todorova*

9 Marni K. Watkins
10 Nevada Bar No. 9674
11 Chief Litigation Counsel
12 Sabrena K. Clinton
13 Nevada Bar No. 6499
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15 Iva K. Todorova
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24 *Attorneys for Governor Joseph Lombardo*
25 *and Attorney General Aaron Ford*

26 DATED this 7th day of May, 2024.
27

28 **GUINASSO LAW, LTD.**

1 */s/ Jason D. Guinasso, Esq.*

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7 *Attorney for Plaintiff*

8 DATED this 7th day of May, 2024.
9

10 **ERICKSON THORPE & SWAINSTON,**
11 **LTD**

12 */s/ Brent L. Ryman*

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21 *Attorneys for Defendants Nye County,*
22 *Elko County, and Storey County*

1	DATED this 8 th day of May, 2024.	DATED this 8 th day of May, 2024.
2	GUNDERSON LAW FIRM	THE OMARA LAW FIRM, P.C.
3	/s/ Courtney Sweet	/s/ David C. O'Mara
4	Courtney Sweet Nevada Bar No. 3895 Warren Way Reno, NV 89509 csweet@gundersonlaw.com	David C. O'Mara Nevada Bar No. 311 E. Liberty Street Reno, NV 89501 david@omaralaw.net
5		
6		
7		
8	<i>Attorneys for Defendants Mustang Ranch Productions, LLC and Leonard "Lance" Gilman</i>	<i>Attorneys for Defendant Desert Rose Club, LLC</i>
9		
10	DATED this 9 th day of May, 2024.	
11	FOX ROTHSCHILD LLP	
12	/s/ Deanna L. Forbush	
13	DEANNA L. FORBUSH (6649) REX D. GARNER (9401) 1980 Festival Plaza Drive, Ste. 700 Las Vegas, Nevada 89135 dforush@foxrothschild.com	
14		
15	<i>Attorneys for Western Best, Inc. d/b/a Chicken Ranch Western Best, LLC</i>	
16		
17		<u>ORDER</u>
18	IT IS HEREBY ORDERED discovery deadlines shall be stayed until this Court has	
19	adjudicated the above dispositive motions.	
20	IT IS SO ORDERED this 13th day of May, 2024.	
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22		UNITED STATES MAGISTRATE JUDGE
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